

United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

TIMOTHY EDWARD CARSON

CRIMINAL COMPLAINT

Case Number:

10-mj-2 JG

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 6, 2010, in Dakota County, in the State and District of Minnesota, defendant did

by force, violence and intimidation, take from the person and presence of a victim teller, money which belonged to and was in the care, custody, control, management, and possession of Wells Fargo Bank, located at 15574 Pilot Knob Road, Apple Valley, Minnesota, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, and in committing the offense, the defendant did assault and put in jeopardy the life of another person by use of a dangerous weapon, that is, a handgun,

in violation of Title 18 United States Code, Section(s) 2113(a) & (d) .

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

1/7/10

Date

The Honorable Jeanne J. Graham
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer

at

St. Paul, MN

(City and State)

Signature of Judicial Officer

Julie Hunter

Signature of Complainant

JULIE HUNTER, Special Agent
FBI

SCANNED

JAN 07 2010

U.S. DISTRICT COURT ST. PAUL

STATE OF MINNESOTA)
) ss. AFFIDAVIT OF JULIE HUNTER
COUNTY OF RAMSEY)

Your affiant, Julie Hunter, being first duly sworn under oath, does depose and state as follows

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice, and have been so employed since 1992. I am assigned to a squad that investigates violent crime, to include bank robberies, gangs, firearms violations and narcotics violations.

2. This affidavit is based on my training, experience, personal knowledge and observations in this investigation; upon my discussions with other law enforcement officers and agents directly involved in this investigation; and upon my review of official reports submitted in relation to this investigation.

3. On January 6, at 9:16 a.m., a robbery occurred at the Wells Fargo Bank, located at 15574 Pilot Knob Road, in Apple Valley, Minnesota. The bank was insured by the Federal Deposit Insurance Corporation at the time of the robbery. The robbery was committed by a lone white male, wearing a black ski mask, black jacket, blue jeans, dark colored shoes with white soles, black gloves with what appears to be a velcro flap, with a logo. He was carrying a black backpack. He was brandishing a handgun. It was a takeover style robbery; the robber jumped onto the counter, pointed the handgun at all three tellers working at the time, and ordered everybody to put their hands up and heads down. He ordered the tellers to give him all of the money. The tellers complied, and gave the robber cash.

According to an audit, the amount taken in the robbery was \$4,580. The robber put the money in the backpack, and ran from the bank. Based on exterior video from a nearby Target store, the robber ran approximately 200 to 300 yards to a light colored vehicle, which was parked in a parking space in front of a vacant strip mall. A series of shoe prints in the snow was obtained from the sidewalk in front of the vacant strip mall, near the getaway vehicle. The shoe prints had the words "impact zone" on the soles of the shoes.

4. On January 6, at 8:37 a.m., a traffic stop of a white Mitsubishi Galant, Minnesota license plate MVE 260, was conducted by Officer Kurt Schultz, of the Apple Valley Police Department. Officer Schultz had observed that the vehicle did not have a front license plate that was visible. The traffic stop was conducted on southbound Cedar Avenue, at 140th Street, in Apple Valley. The vehicle was being driven by Timothy Edward Carson, who was the lone occupant of the vehicle. Carson identified himself as a police officer, and indicated he had a loaded gun in his vehicle. Officer Schultz had Carson get out of the vehicle. Carson showed Officer Schultz a Minneapolis Police Department employee identification. Officer Schultz confirmed that Carson had a valid driver's license, told him that his vehicle lacked a front license plate, and allowed him to leave. The location of the traffic stop is approximately three miles from the Wells Fargo bank that was robbed later that morning.

5. At approximately 9:17 a.m., Officer Schultz received a

dispatch regarding the Wells Fargo bank robbery. While enroute to the bank, at 9:22 a.m., Officer Schultz observed the same White Mitsubishi Galant, Minnesota license plate MVE 260, stopped at the intersection of northbound Johnny Cake Ridge Road and 140th Street, in Apple Valley. Officer Shultz observed that Carson was the driver and lone occupant of the vehicle. At the time that Officer Schultz observed the vehicle that second time, it was approximately two miles north of the Wells Fargo bank, and was traveling northbound.

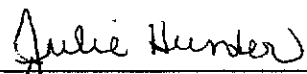
6. It has been confirmed that Timothy Edward Carson is employed as an Officer with the Minneapolis Police Department. According to his supervisor, Carson was scheduled to begin his shift on January 6, 2010, at 9:00 a.m. However, he arrived late. At some point around 9:30, a call was place to Carson, inquiring as to his status, and he indicated he was running late. It is believed that he began his shift at around 10:00 a.m.

7. On January 6, at approximately 7:20 p.m., Apple Valley Detective Mike Pritzlaff and FBI SA James Walden spoke with Carson at the Minneapolis Police Department (MPD) Special Operations Division, located at 4119 Dupont Avenue North, in Minneapolis. Carson was advised that he was not under arrest. They asked Carson about the circumstances surrounding the traffic stop which had occurred that morning in Apple Valley. Carson was eventually asked whether he had committed the Wells Fargo bank robbery that morning, as well as a series of other armed robberies in Apple Valley and the surrounding area. Carson initially denied any involvement in the

bank robbery, or in any other robberies. However, Carson then admitted that he had committed the robbery of the Wells Fargo bank earlier that day. He told Detective Pritzlaff and SA Walden where evidence from the bank robbery was located. Some of the clothing worn in the robbery, including the coat, ski mask, gloves and tennis shoes with the words "impact zone" on the soles, as well as the backpack used, were found in a trash can outside the MPD Special Operations Division. Cash taken in the bank robbery in the amount of \$2,940, and the gun used in the robbery were found in Carson's locker at the MPD Special Operations Division.

8. Later in the evening of January 6, 2010, a Mirandized interview of Carson was conducted by Detective Pritzlaff and SA Walden at the Apple Valley Police Department. The interview was videotaped and audiotaped. Carson again admitted to having committed the bank robbery earlier that day at the Wells Fargo Bank in Apple Valley. Carson also admitted having committed numerous other armed robberies in Dakota County and Hennepin County.

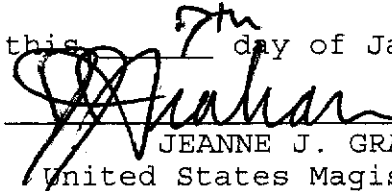
Further your affiant sayeth not.



JULIE HUNTER, Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me

this ^{7th} day of January, 2010.



JEANNE J. GRAHAM
United States Magistrate Judge